



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-406
Active Ingredient(s) and/or representative test compound(s) Copper sulfate pentahydrate	Date 02/12/2018
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food and nonfood uses; Domestic outdoors	Product Name DREXEL COPPER SULFATE TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Label amendment submission to add EPA approved uses.

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 02/12/2018	Typed or Printed Name and Title SCOTT PACE, Director of Registration Division
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Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 02/12/2018			EPA Reg No./File Symbol 19713-406		Page 1 of 9
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL COPPER SULFATE TECHNICAL		
Ingredient COPPER SULFATE PENTAHYDRATE					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition	43364101	Copper Sulfate Task Force	Own	
830.1600	Description of materials used to produce the product	43364101	Copper Sulfate Task Force	Own	
830.1620	Description of production process	43364101	Copper Sulfate Task Force	Own	
830.1670	Discussion of formation of impurities	43364101	Copper Sulfate Task Force	Own	
830.1700	Preliminary analysis	43364102	Copper Sulfate Task Force	Own	
830.1750	Certified limits	43364103	Drexel Chemical Company	Own	
830.1800	Enforcement analytical method	47532501	Drexel Chemical Company	Own	
830.6302	Color	43364105	Copper Sulfate Task Force	Own	
830.6303	Physical state	43364105	Copper Sulfate Task Force	Own	
830.6304	Odor	43364105	Copper Sulfate Task Force	Own	
830.6313	Stability to sunlight, normal & elevated temperature, metal	43364105	Copper Sulfate Task Force	Own	
830.6314	Oxidation /Reduction reaction	47532501	Drexel Chemical Company	Own	
830.6317& 830.7320	Storage stability & Corrosion Characteristics	47532502	Copper Sulfate Task Force	Own	
830.7000	pH	43364105	Copper Sulfate Task Force	Own	
830.7050	UV Visible Spectrum	47519001	Drexel Chemical Company	Own	
Signature			Name and Title		Date 02/12/2018

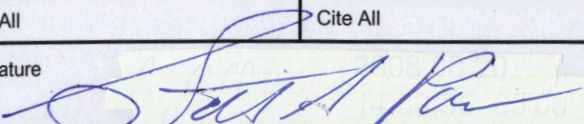


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Ingredient COPPER SULFATE PENTAHYDRATE					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting point	43364105	Copper Sulfate Task Force	Own	
830.7220	Boiling point	43364105	Copper Sulfate Task Force	Own	
830.7300	Density/Bulk density	43364105	Copper Sulfate Task Force	Own	
830.7370	Dissociation constant	43364105	Copper Sulfate Task Force	Own	
830.7550	Octanol/Water partition coefficient	43364105	Copper Sulfate Task Force	Own	
830.7840	Solubility to water and organic solvents	43364105	Copper Sulfate Task Force	Own	
830.7950	Vapor pressure	43364105	Copper Sulfate Task Force	Own	
870.1100	Acute oral toxicity	43396201	Copper Sulfate Task Force	Own	
870.1200	Acute dermal toxicity	43396201	Copper Sulfate Task Force	Own	
870.1300	Acute inhalation	43147001	Phelps Dodge Refining Corp.	Old	
870.2400	Acute eye irritation	-	-	-	Self validated
870.2500	Acute dermal irritation	43396201	Copper Sulfate Task Force	Own	
870.2600	Skin sensitization	-	-	-	Self validated
GENERIC DATA					
Cite All	Cite All	Cite All	Copper Sulfate Task Force	Own	
Signature 			Name and Title Scott Pace, Director of Registration		Date 02/12/2018



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Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL COPPER SULFATE TECHNICAL

Ingredient Copper sulfate pentahydrate

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Copper Company Inc.	Pay	
			E.I. Du Pont	Pay	
			Arch Chemicals, Inc.	Pay	
			Phelps Dodge Refining Corp.	Pay	
			Agrico Chemical Co.	Pay	
			N. Jonas & Co, Inc.	Pay	
			Qualco, Inc.	Pay	
			Bio-Lab Inc.	Pay	
			Value Gardens Supply	Pay	
			Helena Chemical Company	Pay	
			Rockwin Pro. Company, Inc.	Pay	
			Seaboard Industries	Pay	
			GLB Pool & Spa	Pay	
			Roebic Laboratories, Inc.	Pay	
			ICL-IP America, Inc	Pay	

Signature

Name and Title

SCOTT PACE, DIRECTOR OF REGISTRATION

Date

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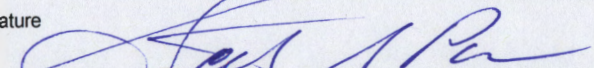
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Applicant's/Registrant's Name & Address
DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product
DREXEL COPPER SULFATE TECHNICAL

Ingredient Copper sulfate pentahydrate

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Applied Biochemists	Pay	
			Gowan Company	Pay	
			Chemical Specialties, Inc	Pay	
			Marjon & Associates	Pay	
			CP Chemicals, Inc.	Pay	
			Mid America Research Chemical Corp.	Pay	
			Consumer Chemical Corp.	Pay	
			Diversified Waterscapes, Inc.	Pay	
			Spectrum Brands, Inc.	Pay	
			Brewer International, Inc.	Pay	
			PBI Gordon Corp.	Pay	
			Days Ease Home Products Corporation	Pay	
			Bio-Dex Laboratories	Pay	
			Industrias Quimicas Del Valles, SA	Pay	
			Philbro-Tech, Inc	Pay	

Signature  Name and Title
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DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL COPPER SULFATE PENTAHYDRATE

Ingredient Copper sulfate pentahydrate

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Liquid Chemical Corp.	Pay	
			Bay Chemical & Supply Company	Pay	
			Teck Cominco American Inc.	Pay	
			Old Bridge Chemicals, Inc.	Pay	
			Agro-K Corporation	Pay	
			Phoenix Products Company	Pay	
			Phyton Corporation	Pay	
			BASF Sparks LLC	Pay	
			Florida Water Works, Inc.	Pay	
			Ingenieria Industrial SA De CV	Pay	
			PBI Gordon Corp.	Pay	
			Chem One Ltd.	Pay	
			Alltech Inc.	Pay	
			Lo-Chlor L.C.	Pay	
			Tech Comingo Metals Ltd.	Pay	

Signature

Name and Title

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Date

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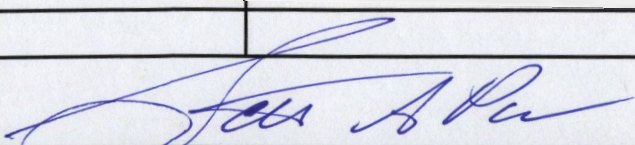


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Ingredient Copper sulfate pentahydrate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Chem-A-Co Inc.	Pay	
			Thronton, Musso & Bellemin, Inc.	Pay	
			American Chemistry Council	Pay	
			Earth Science Laboratories, Inc.	Pay	
			SSI Corporation	Pay	
			Spray Drift Task Force	Own	
			Magna-Bon II, LLC	Pay	
			Recreational Water Products, Inc.	Pay	
			Sepro Corp.	Pay	
			Zodia Pool Systems, Inc.	Pay	
			Pure Pools, Inc.	Pay	
			Altivia Corporation	Pay	
			Geo Specialty Chemicals	Pay	
			CNM Technologies	Pay	
			Crystalline H2O, Inc	Pay	
Signature 			Name and Title SCOTT PACE, DIRECTOR OF REGISTRATION		Date 02/12/2018



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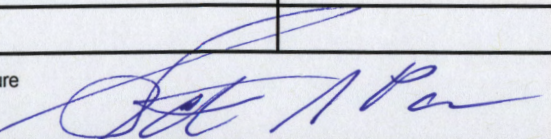
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Product

DREXEL COPPER SULFATE TECHNICAL

Ingredient Copper sulfate pentahydrate

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Outdoor Residential Exposure Task Force	Own	
			Agricultural Reentry Task Force	Own	
			Halosource, Inc	Pay	
			Cheltec, Inc.	Pay	
			Emron Corporation	Pay	
			Crystal Clear Pool & Spa	Pay	
			FIFRA Endangered Species Task Force	Pay	
			Residential Exposure Joint Venture Task Force	Pay	
			Bent Oak Farm Supply	Pay	
			Agricultural Handler Exposure Task Force	Own	
			Archangel LLC	Pay	
			Poolrx Worldwide	Pay	
			Phoenix Environmental Care LLC	Pay	
			American Chemistry Council	Pay	
			Quadruel LLC	Pay	
Signature			Name and Title		Date
			SCOTT PACE, DIRECTOR OF REGISTRATION		02/12/2018



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Product

DREXEL COPPER SULFATE TECHNICAL

Ingredient Copper sulfate pentahydrate

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Chemtrade Solutions LLC	Pay	
			Quartek Corporation	Pay	
			D3W Industries	Pay	
			Camelback Products LLC	Pay	
			Delta Agrochemicals	Pay	
			Nanjing Winsome Chemical Ltd.	Pay	
			JJ's Unlimited	Pay	
			Ocion Water Sciences	Pay	
			Life Science Group, Inc.	Pay	
			C-Pool Minerals, Inc	Pay	
			Mintech Absorbents, LLC	Pay	
			Generic Endangered Species Task Force	Own	

Signature

Name and Title

SCOTT PACE, DIRECTOR OF REGISTRATION

Date

02/12/2018

DATA MATRIX NOTES – DREXEL COPPER SULFATE TECHNICAL (19713-406)

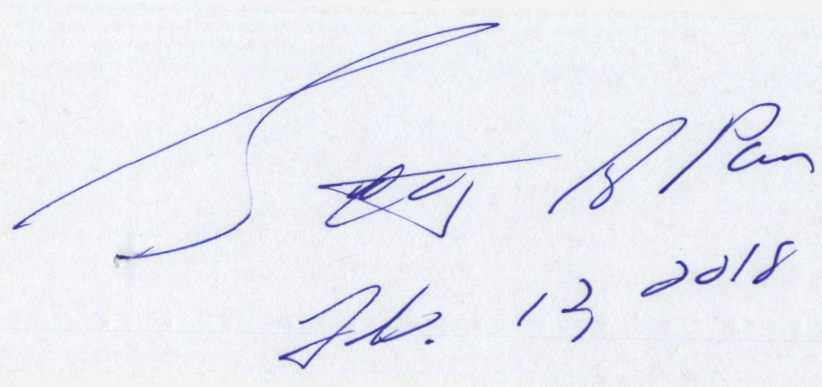
OPPTS 830.6315 Flammability: Not applicable. Product is not potentially explosive.

OPPTS 830.6316 Explodability: Not applicable. Product is not potentially explosive.

OPPTS 830.6319 Miscibility: Not applicable. Product is a solid.

OPPTS 830.6321 Dielectric breakdown voltage: Not applicable. Product is a solid and not intended for use around electrical equipment.

OPPTS 830.7100 Viscosity Not applicable. Product is a solid.



Handwritten signature and date: J. Pan, Feb. 13 2018